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7 CBS BROADCASTING INC., CBS  
8 CORPORATION, and ROBERT NIÑO

8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA

10 NANCY LONDON,

11 Plaintiff,

12 vs.

13 CBS; CBS BROADCASTING INC.;  
14 CBS TELEVISION; KCAL LLC;  
15 KCBS TV; ROBERT NINO; and  
16 DOES 1-100,

16 Defendants.

CV 12 - 06605 GAF (FMOx)

DECLARATION OF ANNE M.  
BRAFFORD IN SUPPORT OF  
DEFENDANT CBS CORPORATION'S  
NOTICE OF REMOVAL TO THE  
UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF  
CALIFORNIA

FILED  
2012 JUL 31 PM 2:50  
CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
SANTA ANA

**DECLARATION OF ANNE M. BRAFFORD**

I, Anne M. Brafford, hereby declare as follows:

1. I am a partner at the law firm of Morgan, Lewis & Bockius LLP, attorneys of record for Defendant CBS Corporation ("CBS") in the above-captioned action. I am licensed to practice law in California and am admitted to practice law before this Court. I submit this declaration in support of CBS's removal to the United States District Court for the Central District of California. I have direct and personal knowledge of the facts set forth in my Declaration and, if called and sworn as a witness, I would competently testify to these facts.

2. On June 15, 2012, I spoke with Plaintiff's counsel Andrew Morrison over the phone to meet and confer about Defendant CBS Broadcasting Inc. and Robert Niño's Demurrers pending in Superior Court. During our discussion, I asked Mr. Morrison whether Plaintiff would be willing to amend her Complaint to voluntarily dismiss Individual Defendant Robert Niño since Plaintiff could not plead a valid claim against him. Mr. Morrison stated that he would likely agree to dismiss Mr. Niño only if Defendant would agree not to remove this case to federal court. I did not agree to forego CBS' right to remove.

3. I have been practicing employment litigation for over 16 years, and have practiced in Southern California since 2004. In my experience, plaintiff's counsel in employment discrimination cases like this one typically have an hourly rate between \$300 - \$400 per hour. Based on my experience, I estimate that Plaintiff's counsel Gary B. Ross and Andrew D. Morrison similarly charge between \$300 - \$400 per hour for their work on the instant matter.

1 I declare under penalty of perjury under the laws of the State of California  
2 and the United States that the foregoing is true and correct.

3 Executed this 31 day of July, 2012, at Irvine, California.

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Anne M. Brafford